

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Chapter 13
Reynolds, Dawn
Debtors/ Respondents : 22-10414

**Answer to Motion of
For Relief from Automatic Stay**

Debtor, Dawn Reynolds, by and through her undersigned attorney, hereby provides the following answers to the Motion for Relief from Stay filed by U.S. BANK NATIONAL ASSOCIATION (SUCCESSOR TRUSTEE FOR THE PENNSYLVANIA HOUSING FINANCE AGENCY, PURSUANT TO SAID TRUST INDENTURE. ("U.S. Bank, N.A." and/or "Movant"). These responses are made without prejudice to debtor's right to present additional facts or contentions at trial based upon information hereinafter obtained or evaluated. Debtor specifically reserves the right to supplement or amend her responses or present additional facts and contentions at a later date to any of the answers given.

1. Denied. The allegation contained herein are directed to a party other than the answering debtor, and they are denied as no response is required.

2. Admitted in part. It is admitted that Debtor is the owner of the premises 6828 North 9th Street, Philadelphia, PA 19126; the remaining averments contained in this Paragraph consist of mischaracterization or summarization of documents that speak for themselves and they are denied as no response is required.

3. Denied. The averments contained in this Paragraph consist of mischaracterization or summarization of documents that speak for themselves and they are denied as no response is required.

4. Admitted.

5. Denied as stated. To the extent an answer may be appropriate, the filing of a bankruptcy petition immediately puts into effect the automatic stay, which prevents creditors from taking any further actions against the debtor or the debtor's property with respect to claims arising prior to commencement of the case. See 11 U.S.C. Section 362. By way of further answer, the allegation contained herein are directed to a party other than the answering debtor, and they are denied as no response is required. Proof thereof is demanded.

6. - 8. Denied. Debtor can neither admit nor deny the allegations because Debtor has no personal knowledge of the accuracy of such statements. Strict proof is hereby demanded.

9. -10 Denied. The allegations are legal conclusions of law to which no answer is required.

11. Denied. Debtor can neither admit nor deny the allegations because Debtor has no personal knowledge of the accuracy of such statements. Strict proof is hereby demanded.

For the reasons set forth above, among others, and based on this Court's authority under the Bankruptcy Code, the Debtor prays that the motion be denied, and such other relief as is just and proper. The Debtor specifically reserves the right to supplement the answer at or prior to the hearing thereon.

Dated: May 5, 2023

"/s/" Mitchell J. Prince
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